

By Facsimile

BP Exploration (Alaska) Inc. 900 East Benson Boulevard P.O. Box 196612 Anchorage, Alaska 99519-6612 (907) 561-5111

December 13, 1996

Mr. John Keenan U.S. Environmental Protection Agency Region 10 1200 Sixth Avenue Seattle, WA 98101

NSPS Subpart GG Fuel Sulfur Performance Tests for Emergency Gas Turbines

Dear Mr. Keenan:

This letter is in response to our meeting with you in Seattle on September 20, 1996. Among several issues brought to your attention in the meeting, BP Exploration (Alaska) Inc. (BPX) requested the EPA waive fuel sulfur performance tests and allow monthly liquid fuel sulfur monitoring for three emergency gas turbines operated by BPX. These issues were outlined in our previous letter to Ms. Bonnie Thie dated September 16, 1996.

In our meeting, you agreed that the current monthly liquid fuel sulfur monitoring which BPX conducts will fulfill the fuel monitoring provisions of Subpart GG. As we explained, this monitoring is currently done under our existing Air Quality Control Permit to Operate through the use of a monthly analysis conducted by our fuel supplier (ARCO Crude Topping Unit).

Regarding our request to waive Subpart GG performance testing, you indicated that with respect to the applicable sulfur standards in the NSPS, the performance test may be either an emissions test or sulfur analysis of the fuel. It was agreed that BPX would elect to conduct the fuel analysis rather than an emissions test. You requested that BPX submit to your attention the results of the most recent liquid fuel sulfur analysis to meet the requirements of the performance test. Please find attached copies of the sulfur analysis data.

The analysis is representative of the fuel burned in the following turbines:

Prudhoe Bay Unit-Gathering Center One (GC1)
Prudhoe Bay Unit-Gathering Center Two (GC2)
Prudhoe Bay Unit-Gathering Center Three (GC3)

Allison Turbine Tag No. GTRB-51-8001 Allison Turbine Tag No. GTRB-02-8001 Allison Turbine Tag No. GTRB-03-8001



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The sulfur analysis data is summarized in the table below:

Sample Location	Sulfur (weight percent)				
GC1, T-51-8008	0.17				
GC2, SK318	0.13				
GC3, SK318	0.19				

BPX would appreciate your written response indicating this information fulfills the performance test requirements for Subpart GG with respect to fuel sulfur and that you continue to concur that monthly liquid fuel sulfur content sampling will also meet the monitoring requirements of the NSPS at 60.334(b). Please call Alison Cooke at (907) 564-4838 if you have any questions or require additional information.

Sincerely,

Steven D. Taylor, Manager

Environmental & Regulatory Affairs

SDT/ADC

Attachments

cc: B. T

B. Thie, EPA Region 10, Seattle R. Nye, EPA Region 10, Seattle

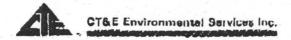
A. Bohn, ADEC, Anchorage

CT&E Ref.#
Client Name
Project Name/#
Client Sample ID
Matrix
Ordered By
PWSID

966151003 Area Ak-Prudhoe Bay Diesel Samples T-51-8008 GC-1 Oil Client PO#
Printed Date/Time 12/11/96 11:10
Collected Date/Time 11/06/96 00:00
Received Date/Time 11/14/96 09:30
Technical Director: Stephen C. Eds

Released By 5

Sample Remarks								
					Alloughle	Pren	Annlysis	
Porameter	Reculto	POL	Unite	Method	Limite	Dote	Date	Init
Total Gulfur	0.17	0.0100	*	A614 D-129		11/22/96	11/22/96	DKT



CT&E Ref.# Client Name Project Name/# Client Sample ID Matrix Ordered By **PWSID**

966151002 Arco Ak-Prudhoe Bay Diesel Samples GC-2 SK318

Oil

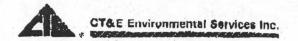
Client PO#

Printed Date/Time 12/11/96 11:10 Collected Date/Time: 11/06/96 00:00 Received Date/Time 11/14/96 09:30 Technical Director: Stephen C. Ede

Released By

Sample Remarks:

Allowable Prep Analysis Date POL Unite Method Linits Perameter Total Bulfur 0.13 0,0100 % ASTM D-129 11/22/96 11/22/96 DNY



CT&E Ref.#
Client Name
Project Name/#
Client Sample ID
Matrix
Ordered By
PWSID

966151001 Arco Ak-Prudhoe Bay Diesel Samples GC-3 SK318 Oli

Client PO#

Printed Date/Time 12/11/96 11:10
Collected Date/Time 11/06/96 00:00
Received Date/Time 11/14/96 09:30
Technical Director: Stephen C. Ede

Released By

Sample Remarks:

Paramater Results POL Units Method Limits Date Date Init

Total Sulfur D.19 0.0100 % ASTM D-129 11/22/96 11/22/96 DHT